

distinguish the claimed invention over the cited Tanaka reference. The Applicant further respectfully submits that newly submitted claims 193-210 are not obvious in view of the claims of U.S. Nos. 6,513,058, 5,867,385, 6,516,236, and 5,691,897.

Given the foregoing, the Applicant respectfully submits that newly presented claims 193-210 are in condition for allowance, and such allowance is respectfully requested.

The Applicant has also taken this opportunity to update the Related Applications section of the application.

Enclosed herewith as Exhibit A is a document entitled Listing of All Amendments and Claims (10-20-2006) containing the amendments to the specification and claims. Exhibit A identifies the amendments to the specification and to the text of each pending claim, along with any amendments made hereby (illustrated using strikethrough and underlining) and the status of each pending claim.

If there is any matter which could be expedited by consultation with the Applicant's attorney, such would be welcome. The Applicant's attorney can normally be reached at the telephone number below.

Signed at Bellingham, County of Whatcom, State of Washington this 20th day of October, 2006.

Respectfully submitted,

BROWN et al.

By Michael R. Schacht
Michael R. Schacht, Reg. No. 33,550
2801 Meridian Street, Suite 202
Bellingham, WA 98225-2400
phone: (360) 647-0400
fax: (360) 647-0412
Customer No. 30662

CERTIFICATE OF MAILING
37 C.F.R. §1.8

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service as first class mail in an envelope addressed to Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Signature: Susie Hubka
Print Name: Susie Hubka
Date: October 20, 2006



EXHIBIT A
LISTING OF ALL CLAIMS AND AMENDMENTS
(10-20-2006)

AMENDMENTS TO THE SPECIFICATION

Please amend the three paragraphs under the *RELATED APPLICATIONS* paragraph on page 1 and continuing on page 2 as follows:

This is a continuation of U.S. Patent Application Serial No. 10/316,451 filed on December 10, 2002, which is incorporated by reference in its entirety and which is a continuation of U.S. Patent Application Serial No. 10/021,669 filed on December 10, 2001-~~now~~, now U.S. Patent No. 6,516,236, which is a continuation of U.S. Patent Application Serial No. 09/191,981 filed on November 13, 1998, now abandoned, which is a continuation of U.S. Patent Application Serial No. 08/656,421 filed on May 30, 1996-~~now~~, now U.S. Patent No. 5,867,385, which is a continuation-in-part of U.S. Patent Application Serial No. 08/454,736 filed on May 30, 1995-~~now~~, now U.S. Patent No. 5,691,897.

~~Priority is also claimed from~~ This application is also a continuation of U.S. Patent Application Serial No. 09/795,777 filed on February 27, 2001-~~now~~, now U.S. Patent No. 6,513,058, which is incorporated by reference in its entirety and which is a continuation of U.S. Patent Application Serial No. 09/205,627 filed on December 3, 1998, now U.S. Patent No. 6,209,037, which claims benefit of U.S. Provisional Patent Application Serial No. 60/067,466 filed on December 4, 1997, and which is a continuation of U.S. Patent Application Serial No. 09/191,981 filed on November 13, 1998, now abandoned, which is a continuation of U.S. Patent Application Serial No. 08/656,421 filed on May 30, 1996-~~now~~, now U.S. Patent No. 5,867,385, which is a continuation-in-part of U.S. Patent Application Serial No. 08/454,736 filed on May 30, 1995-~~now~~, now U.S. Patent No. 5,691,897.

~~Priority is also claimed from~~ This application is also a continuation of U.S. Patent Application Serial No. 09/633,633 filed on August 7, 2000-~~now~~, now U.S. Patent No. 6,941,543, which is incorporated by reference in its entirety and which is a continuation of U.S. Patent Application Serial No. 09/191,981 filed on November 13, 1998, now abandoned, which is a continuation of U.S. Patent Application Serial No. 08/656,421 filed on May 30, 1996-~~now~~, now

U.S. Patent No. 5,867,385, which is a continuation-in-part of U.S. Patent Application Serial No. 08/454,736 filed on May 30, 1995~~now~~now U.S. Patent No. 5,691,897.

AMENDMENTS TO THE CLAIMS**Claims 1 – 192 (canceled)**

193. A system for communicating with a motion controller, comprising:
a set of motion commands;
a set of motion operations, where at least one motion operation is associated
with at least one motion command;
a reprogrammable motion controller capable of executing at least one motion
command;
a set of selectable software modules, where
at least one software module is associated with at least one motion
controller, and
at least two selectable software modules expose a common software
interface; and
a software system that is capable of commanding at least one motion controller
to perform at least one motion operation using the common software
interface exposed by at least one selected software module associated
with at least one motion controller.
194. A system as recited in claim 193 in which a definition of the common
software interface is programmatically acquirable.
195. A system as recited in claim 193, in which a definition of the common
software interface is acquirable from at least one of the selectable software modules in
the set of selectable software modules.
196. A system as recited in claim 193, further comprising an operating system
on which the software module is run.

197. A system as recited in claim 196, in which a definition of the common software interface is acquirable from the operating system.

198. A system as recited in claim 193, in which a definition of the common software interface is acquirable from a persisted storage medium.

199. A system as recited in claim 198, in which the persisted storage medium is a disk file.

200. A system as recited in claim 193, in which at least one motion operation causes data to be read from the motion controller.

201. A system as recited in claim 193, in which at least one motion operation causes data to be received from the motion controller.

202. A system as recited in claim 193, in which at least one motion operation causes motion data to be written to the motion controller.

203. A system as recited in claim 193, in which at least one motion operation causes an object to move.

204. A system as recited in claim 193, in which at least one primitive motion operation causes a motion device to move.

205. A system as recited in claim 193, in which the software system further comprises a user interface for selecting at least one selectable software module.

206. A system as recited in claim 193, in which the software system further comprises software functionality that programmatically selects at least one selectable software module.

207. A system as recited in claim 193, further comprising a selection software module comprising a user interface that allows at least one selectable software module to be selected.

208. A system as recited in claim 193, further comprising a selection software module comprising software functionality that programmatically selects at least one selectable software module.

209. A system as recited in claim 193 in which the motion commands comprise primitive motion commands and non-primitive motion commands, wherein:
functionality of the non-primitive motion commands can be emulated by a
combination of primitive motion commands; and
functionality of the primitive motion commands cannot be emulated by a
combination of primitive motion commands.

210. A system as recited in claim 209, in which the motion operations comprise primitive motion operations and non-primitive motion operations, wherein:
functionality of the non-primitive motion operations can be emulated by a
combination of primitive motion operations;
functionality of the primitive motion operations cannot be emulated by a
combination of primitive motion operations;
each non-primitive motion operation is associated with at least one non-primitive
motion command; and
each primitive motion operation is associated with at least one primitive motion
command.